



Superintendent’s Order # 31

Safety, Environmental Management, and Sustainability

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Approved:	 _____ /s/ _____ Robert J. Krumenaker, Superintendent

In an organization like this, short-handed as we are and with all the exceptional episodes that have to be dealt with, we are inclined to devote a disproportionate amount of time to the mechanics of our business and a minimum to the fundamentals, which deal many times with intangibles. It is good, therefore, that there are thinkers who periodically call us back to consideration of the matters of prime importance.

— Written in October 1944 by NPS Director Newton Drury in a letter to Ansel Adams.

Contents

A. Purpose and Background..... 1

B. Guiding Principles..... 2

C. Integrated Park Safety and Environmental Commitments..... 3

D. Definitions 5

E. Management Approach..... 6

F. Policy Framework..... 7

A. Purpose and Background

The National Park Service (NPS) is committed to high standards of safety and environmental stewardship at Apostle Islands National Lakeshore (referred to as “APIS” or “park” hereafter). This

Superintendent's Order describes the guiding principles for safety management, environmental management, and sustainable practices at APIS and sets forth the top level commitments we make to uphold excellence in these areas. By providing environmental policy direction in support of the park's Integrated Environmental Plan this Superintendent's Order also functions as the park's Environmental Commitment Statement.

Our most valuable resources are the people who work to carry out the mission of the park. Whether paid staff, volunteers, or contracted personnel, the bottom line is the same--we want our employees and their families to be safe and healthy both at work and at home. This strong safety culture complements our respect for the park's natural and cultural resources and our concern for the long term health and integrity of the broader global environment. In 2005, *National Geographic Traveler* Magazine named APIS the nation's most sustainable national park. In 2005 and 2006, the governments of four of the park's gateway communities (the cities of Ashland, Washburn, and Bayfield and the town of Bayfield) each passed resolutions committing themselves to the goal of sustainability and following The Natural Step. Several of these resolutions acknowledged the park as a leader in these communities' efforts towards sustainability. This Superintendent's Order defines the principles, commitments, and management approach we will implement to assure we deserve, and continue to deserve, such recognition. The combined energy of all members of the entire organization is necessary to continuously improve safety and environmental performance, including reducing safety risks and environmental impacts, reducing safety and environmental incidents, and making park operations and activities more sustainable.

These attitudes towards safety and environmental stewardship are intimately linked, and therefore they are encompassed under one Superintendent's Order, although each program also has additional detailed and separate documentation. Currently, environmental management and sustainability are conducted within the framework of the park's Integrated Environmental Plan, which fulfills the requirements of the NPS Environmental Management System (EMS) model and the Office of Management and Budget EMS Scorecard. Safety management is addressed under the park's Documented Safety Plan (SO#39). The inter-relationship between these plans is understood at all levels of the organization and reflected in the way in which they are documented and carried out.

B. Guiding Principles

[The Natural Step](#) is a framework adopted by many communities and organizations in the United States and around the world to guide the journey towards sustainable practices. Several of the park's gateway communities have adopted resolutions declaring themselves "Eco-Municipalities" and committing to sustainable development. The park continues to be a significant player in these and other local efforts towards sustainability. Accordingly, APIS management and staff hereby commit to all reasonable efforts to implement sustainable practices in policy development, planning, management decisions, and operations at APIS consistent with The Natural Step. The principles of The Natural Step are translated and expressed as guiding principles for APIS as follows:

Natural Step System Condition ("In the sustainable society...")	Representative Icons	APIS Guiding Principles
Nature is not subject to systematically increasing concentrations of substances extracted from the earth's crust.		<ul style="list-style-type: none"> • Eliminate the use of non-renewable energy sources. • Re-use and recycle non-renewable natural resources.
Nature is not subject to systematically increasing concentrations of substances produced by society.		<ul style="list-style-type: none"> • Eliminate the use of toxic substances harmful to our environment and community. • Reduce dependence upon synthetic materials that do not break down to harmless substances.
Nature is not subject to systematically increasing degradation by physical means.		<ul style="list-style-type: none"> • Manage the land, water, soil, wildlife, and other natural resources under the stewardship of APIS in ways that improve their condition and mimics or restores natural conditions.
and, in that society, people are not subject to conditions that systemically undermine their capacity to meet their needs		<ul style="list-style-type: none"> • Strengthen our staff and local community members by: <ul style="list-style-type: none"> ○ Honoring their diversity and culture; ○ Assuring safe practices and facilities for their use; and ○ Providing opportunities for all to access and be inspired by park resources. • Encourage full and fair civic engagement in park affairs by all community members and encourage park staff to be active in community civic affairs.

[Read an explanation of the Natural Step Four System Conditions](#)

Management and staff at APIS will consider these principles in park planning and operations and strive, to the degree possible, to match our actions to these principles. These principles are reflected in future visions described in the Integrated Environmental Plan. Each future vision embodies the ideal environmental performance level that park staff collectively desire to achieve over a period of years (e.g., carbon neutral operations). Goals, objectives, and targets are established annually as part of the planning process that ensures the park as a whole will steadily progress toward each future vision.

C. Integrated Park Safety and Environmental Commitments

To further the above principles, APIS management and staff will strive to fulfill the following safety and environmental commitments in the practice of park operations and activities.

1. APIS commits to meeting, and exceeding when possible, local, state, federal, and NPS requirements for environmental and safety compliance.

2. APIS will strive to eliminate all preventable workplace accidents, spills, or lost time injuries at APIS. Nearly all workplace accidents and most hazardous materials spills occurring in parks are preventable, the result of unsafe acts or a lack of vigilance and attention performed by employees. Each APIS employee shares in the responsibility to achieve a safe and sustainable workplace and to avoid accidents and environmental damages. Working safely and in an environmentally responsible manner is a condition of employment at APIS, and we each must take full responsibility for our own actions. The recognition and elimination of unsafe or environmentally harmful acts and conditions will be identified as an important aspect of each employee's performance; and efforts to improve workplace safety and institute environmentally preferable practices will be recognized and rewarded.
3. Safety and environmental performance will be considered in everything we do, by every employee, starting from the top. Accountability for providing a safe workplace, a strong safety culture, and a commitment to environmental compliance and sustainability within the park rests with line management. Park supervisors from the Superintendent through first line supervisors are charged with ensuring their leadership creates a workplace climate which enhances safety communication, assures environmental compliance, and promotes sustainable practices. Line managers and supervisors have the primary responsibility for leading regular inspections and audits of their work areas and for the prompt and thorough reporting and investigation of accidents and environmental incidents, including spills and releases. Employees at every level will participate in inspection of their work areas, critique of their work practices, and investigation of accidents and incidents.

We will assign clear responsibility to our employees for safety and environmental activities and hold them accountable for their performance, recognizing superior effort when it is demonstrated. Performance standards for all supervisors will include a safety, environmental compliance, and sustainability performance element.

4. Employees will receive sufficient training to perform their work safely and in an environmentally sound, sustainable manner. Supervisors will ensure employees are not assigned to tasks for which they have not received training in safe and appropriate work practices, and will identify and arrange for special orientation, training, or certification required for the operation of all equipment. Employees will be provided training in their environmental compliance responsibilities, and will be supported in seeking knowledge of and current information about environmentally sustainable practices.
5. Accidents, with or without injuries, as well as spills or releases of hazardous substances, will be reported and investigated in a prompt and thorough manner so we learn from and do not repeat them. Supervisors will promptly perform initial reporting and investigation as specified in the park Documented Safety Plan and Integrated Environmental Plan accordingly. Principles of root cause analysis will be employed and results of investigation will be reported to the Superintendent. Corrective actions will be developed accordingly (consistent with procedures in the Documented Safety Plan or Integrated Environmental Plan) with an emphasis on obtaining systematic solutions rather than quick fixes.
6. Lessons learned from the investigation of safety and environmental accidents, incidents, and near misses will be identified and shared with all employees. The information learned from self reporting and investigations will be shared with all staff in a non-confrontational manner. Management and supervisory staff will foster an environment that promotes open dialogue with

involved parties and other staff. Employees will be encouraged to report their own near-misses to their supervisors.

7. Park operational equipment will be maintained in safe and environmentally sound condition. Employees and supervisors will maintain the equipment they use in safe and environmentally sound condition and operate that equipment at all times within its safe operating limitations and with diligence to prevent environmental harm. Supervisors will forward information on safety or environmental-related equipment repair or replacement needs to the management team for consideration in budget allocation decisions. Critical deficiencies will be corrected promptly or the equipment will be red-lined. Supervisors will never knowingly assign employees to work with unsafe equipment or in hazardous conditions without proper training and personal protective equipment. If it cannot be used safely or without causing unacceptable environmental damage, we will not use it.
8. We are committed to continuous improvement. We will establish quantifiable metrics in our objectives and targets and monitor our safety and environmental performance as detailed in the park Documented Safety Plan and Integrated Environmental Plan.
9. Our sustainability efforts will lead by example. APIS will strive to be a leader in the NPS and in our community by demonstrating sustainable environmental practices, including toxics reduction and pollution prevention. Park staff will be empowered to use the park's high visibility to communicate with park visitors and members of the surrounding communities about our efforts and the applicability of sustainable practices beyond the park. Park employees will be encouraged to apply sustainable practices at home, and bring best practices they learn about to the workplace.

D. Definitions

Safety means the freedom or avoidance of harm, injury, loss, or hazard, or undue risk of any of these. A safe workplace is one where employees are well trained, the equipment and materials used are in proper working order and meet or exceed all operating standards and requirements and individuals take responsibility for their actions and the actions of those around them by using all appropriate precautions to assure the work is accomplished without harm, injury, loss, or hazard.

Environmental Management System is a systematic and proactive approach to focus an organization's time and efforts toward environmental matters of prime importance while making the mechanics of environmental compliance and management easier and more reliable. The NPS EMS emphasizes internal goal setting and planning as a means to achieve lasting environmental benefits and is an important component of APIS' sustainability efforts.

Sustainability means many things to different people and organizations¹, but virtually all definitions contain the common elements of environment, economics, and community, with a focus on the long

¹ **Brundtland Commission** (1987): Meeting the needs of the present generation without compromising the ability of future generations to meet their needs. **EO 13514** (2009): "sustainability" and "sustainable" mean to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations. **DOI 515 DM 4** (2008): Sustainability means to create and maintain conditions, under which humans and nature can exist in productive harmony, that permit fulfilling the social, economic, and other requirements of present and future generations of Americans.

term, and establish the interrelatedness of all three. For APIS, commitment to sustainability means a commitment to strive for maximum sensitivity and protection for the park's (and the planet's) natural and cultural resources, doing so in a way that is economically sensible and considers the short and the long term impacts of our decisions. It also means treating our people as a valuable resource and valuing our role and contribution to the wider community of which the park and its staff and visitors are members. Another way of saying this is, safety factors being equal; we will strive for the longest lasting, cost-effective, and environmentally-sensitive approach within available budgetary and staff resources.

Accident is an unplanned event that causes, or could cause, injury, damage to property, or environmental degradation. Accidents are almost always the result of a failure of equipment, failure of process or procedure, or failure of an individual to use good judgment or adhere to procedure. Hence, we consider virtually all accidents to be preventable.

E. Management Approach

APIS will achieve its safety, environmental management, and sustainability commitments consistent with the guiding principles through creating a management framework that includes the following elements:

- Establishing and maintaining a park Safety, Environmental Management, and Sustainability (SEMS) Committee;
- Ensuring the park's Documented Safety Plan and its Integrated Environmental Plan are up-to-date and useful to park staff in upholding the park's safety, environmental management, and sustainability commitments;
- Maintaining a vibrant park intranet site devoted to safety, environmental management, and sustainability that allows park staff and other stakeholders to easily access, understand, and use the park's Documented Safety Plan, Integrated Environmental Plan, Best Management Practices and other documents;
- Conducting formal training as well as regular and impromptu "tailgate" sessions to teach, share, and review safe practices, environmental compliance activities, and techniques to improve sustainable operations;
- Conducting routine safety and environmental checks of employee, contractor, and business partner operations and seeking opportunities to praise and reward positive actions and behavior; and
- Correcting safety and environmental deficiencies as soon as practicable.

The charge of the APIS Safety, Environmental Management, and Sustainability Committee is to provide leadership and direction to ensure park employees use environmentally sound, sustainable, and safe practices in the everyday work environment. The SEMS Committee, with support from the Superintendent and Division Chiefs, provides oversight of the management elements described above. The particular roles, responsibilities, and membership of the SEMS Committee are defined in depth in the park's Integrated Environmental Plan.

F. Policy Framework

This Superintendent's Order is informed by external policy directives relating to environmental stewardship and sustainability, and the use of EMS as the organizational approach by which to obtain continuous improvement in environmental performance. These are briefly summarized below. Section 1.0 of the Integrated Environmental Plan explains how each of these policy directives is accounted for in the practice of environmental management, environmental stewardship, and sustainability at the park.

- [EO 13423](#), *Strengthening Federal Environmental, Energy, and Transportation Management* (January 26, 2007) – Requires federal agencies to fulfill goals in several areas of environmental management, pollution prevention, and sustainability. Requires use of an EMS as the framework in which to manage and continually improve these environmental and sustainability practices.
- [EO 13514](#), *Federal Leadership in Environmental, Energy, and Economic Performance* (October 5, 2009) – Builds upon the existing requirements of EO 13423 by updating goals in several areas. Adds requirements for greenhouse gas emissions, water use, storm water management, transportation, and others. Reaffirms EMS as the management framework to identify and achieve sustainability goals, objectives, and targets.
- [SO 3289](#), *Addressing the Impacts of Climate Change on America's Water, Land and Other Natural and Cultural Resources* (September 14, 2009) – Establishes a framework through which DOI bureaus and departments will coordinate climate change science and resource management strategies. Launches the Climate Change Response Council within the office of the Secretary to carry out this coordinated Department-wide strategy.
- [DOI Department Manual: 515 DM 4](#), *Environmental Management Systems* (August 13, 2008) – Sets forth (DOI) Departmental policy, responsibilities, and functions for implementing EMSs as a means to promote environmental compliance and sound environmental stewardship throughout the Department.
- [NPS Director's Order \(DO\) 13A](#), *Environmental Management Systems* (January 1, 2009) – Provides guidance for implementing EMSs at the facility and organizational levels Servicewide. Establishes the ten required elements that form the minimum requirements that must be included in an NPS EMS.
- [NPS Climate Change Response Program](#), *Climate Change Response Strategy* (September 2010) – Coordinates a strategy for agencies and employees to address the impacts of climate change by outlining goals and objectives and guiding actions under four integrated components: science, adaptation, mitigation, and communication.

In addition, this Superintendent's Order is informed by external safety policy directives, including [NPS DO 50B](#), *Occupational Safety and Health Program*, the purpose of which is to provide NPS managers, supervisors, and employees with direction for the implementation of a comprehensive risk management program throughout the NPS. Specific program objectives are to establish and implement a continuously improving and measurable risk management process that:

- Provides for the occupational safety and health of NPS employees;

- Establishes effective site specific occupational safety and health programs at all NPS units;
- Requires other employers operating in NPS units to provide for the occupational safety and health of their employees;
- Identifies strategies to minimize the loss of NPS human, physical, and fiscal resources due to preventable accidents, and
- Coordinates risk management and workers' compensation program management to achieve these objectives.

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